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15 UNITED STATES DISTRICT COURT
16 NORTHERN DISTRICT OF CALIFORNIA
17 SAN FRANCISCO DIVISION

18 WAYMO LLC,
19 Plaintiff,
20 v.
21 UBER TECHNOLOGIES, INC.,
22 OTTOMOTTO LLC; OTTO TRUCKING LLC,
23 Defendants.

Case No. 3:17-cv-00939-WHA

**DEFENDANTS UBER
TECHNOLOGIES, INC.'S AND
OTTOMOTTO LLC'S
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL EXHIBITS TO THEIR
MOTION TO COMPEL PRODUCTION
OF DOCUMENTS**

Pursuant to Civil Local Rules 7-11 and 79-5, Defendants Uber Technologies, Inc. and Ottomotto LLC (collectively, “Defendants”) submit this administrative motion for an order to file under seal Exhibits to Their Motion to Compel Production of Documents. Specifically, Defendants request an order granting leave to file under seal the confidential portions of the following:

Document	Portions to Be Filed Under Seal	Designating Party
Ex. 1	Highlighted Portions	Plaintiff

Exhibit 1 is Plaintiff’s Objections and Responses to Uber’s and Ottomotto’s First Set of Requests for Production (Nos. 1-146), and the highlighted portions of Exhibit 1 contain technical information designated by Waymo as either confidential or highly confidential. (*See* Decl. of Maxwell V. Pritt in Support of Defendants’ Administrative Motion to File Documents Under Seal (“Pritt Decl.”), ¶ 3.)

Pursuant to Local Rule 79-5(d)(2), Defendants will lodge with the Clerk the documents at issue, with accompanying chamber copies. Defendants served Waymo with this motion on July 11, 2017.

For the foregoing reasons, Defendants request that the Court enter the accompanying Proposed Order granting this administrative motion to file documents under seal and designate the service copies of these documents as “HIGHLY CONFIDENTIAL—ATTORNEYS’ EYES ONLY.”

Dated: July 11, 2017

BOIES SCHILLER FLEXNER LLP

By: /s/ Maxwell V. Pritt

Maxwell V. Pritt

Counsel for Defendants
UBER TECHNOLOGIES, INC. AND
OTTOMOTTO LLC